

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

| | | |
|--|---|---------------------------|
| | X | |
| | : | |
| In re: | : | |
| | : | |
| THE FINANCIAL OVERSIGHT AND | : | PROMESA |
| MANAGEMENT BOARD FOR PUERTO RICO, | : | Title III |
| | : | |
| as representative of | : | Case No. 17-BK-3283 (LTS) |
| | : | |
| THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> , | : | (Jointly Administered) |
| | : | |
| Debtors. ¹ | : | |
| | X | |

**INFORMATIVE MOTION REGARDING WITHDRAWAL, WITHOUT PREJUDICE,
OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS' URGENT MOTION,
PURSUANT TO BANKRUPTCY CODE SECTION 105(a), TO COMPEL DEBTORS TO
COMPLY WITH INTERIM COMPENSATION ORDERS, SOLELY AS IT RELATES
TO REQUEST TO COMPEL PAYMENT OF KROMA'S FEES AND EXPENSES**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the "Committee") hereby states as follows:

1. On July 18, 2018, the Committee filed its (A) *Urgent Motion, Pursuant To Bankruptcy Code Section 105(a), to Compel Debtors to Comply With Interim Compensation Orders and (B) Joinder in Motions of Retiree Committee and COFINA Agent to Compel*

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747).

Compliance With Same [Docket No. 3604] (the “Motion to Compel”)² and the related motion to expedite the hearing on the Motion to Compel [Docket No. 3605] (the “Motion to Expedite”).

2. By order dated July 18, 2018 [Docket No. 3608], the court granted the Motion to Expedite, setting the hearing on the Motion to Compel for the omnibus hearing scheduled on July 25, 2018.

3. On July 19, 2018, Paul Hastings received a partial payment on account of its outstanding fees and expenses. In order to allow the parties to seek a consensual resolution regarding payment of the remaining portion of Paul Hastings outstanding fees and expenses, without the need to involve the court, the Committee adjourned the Motion to Compel (with the consent of the Puerto Rico Fiscal Agency and Financial Advisory Authority) solely as it relates to its request to compel payment of Paul Hastings’ outstanding fees and expenses, until the omnibus hearing scheduled for September 12, 2018 at 9:30 a.m. (AST).³

4. At the time the Committee filed the Notice of Adjournment, the Committee understood that the Commonwealth was working on paying Kroma’s outstanding fees and expenses, but that Kroma had not yet been able to confirm receipt of payment. Subsequent to the filing of the Notice of Adjournment, Kroma has confirmed that it received payment on its outstanding fees and expenses. Therefore, the Committee hereby withdraws the Motion to Compel, solely as it relates to the Committee’s request to compel payment of Kroma’s fees and expenses, without prejudice to renewing such request in the future.

² Capitalized terms used but not defined in this informative motion have the meanings set forth in the Motion to Compel.

³ See *Informative Motion Regarding Consensual Adjournment of Official Committee of Unsecured Creditors’ Urgent Motion, Pursuant to Bankruptcy Code Section 105(a), to Compel Debtors to Comply with Interim Compensation Orders, Solely as it Relates to Request to Compel Payment of Paul Hastings’ Fees and Expenses* [Docket No. 3652] (the “Notice of Adjournment”).

5. The Committee reserves all rights with respect to the Motion to Compel, as it relates to its request to compel payment of Paul Hastings' outstanding fees and expenses (which was adjourned to the next omnibus hearing), and nothing in this informative motion should be considered a waiver of any argument therein.

Dated: July 23, 2018

/s/ G. Alexander Bongartz

PAUL HASTINGS LLP
Luc. A. Despina, Esq. (*Pro Hac Vice*)
James R. Bliss, Esq. (*Pro Hac Vice*)
James B. Worthington, Esq. (*Pro Hac Vice*)
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
lucdespina@paulhastings.com
jamesbliss@paulhastings.com
jamesworthington@paulhastings.com
alexbongartz@paulhastings.com

Counsel to the Official Committee of Unsecured Creditors

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC
Juan J. Casillas Ayala, Esq., USDC - PR 218312
Diana M. Batlle-Barasorda, Esq., USDC - PR 213103
Alberto J. E. Añeses Negrón, Esq., USDC - PR 302710
Ericka C. Montull-Novoa, Esq., USDC - PR 230601
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419
Telephone: (787) 523-3434
jcasillas@cstlawpr.com
dbatlle@cstlawpr.com
aaneses@cstlawpr.com
emontull@cstlawpr.com

Local Counsel to the Official Committee of Unsecured Creditors